

1 KEVIN V. RYAN (CSBN 118321)  
United States Attorney

2 EUMI L. CHOI (WVBN 0722)  
3 Chief, Criminal Division

4 CHRISTINA HUA (CSBN 185358)  
CYNTHIA STIER (DCBN 423256)  
5 Assistant United States Attorneys  
450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
Telephone: (415) 436-7534  
7 FAX: (415) 436-7234  
Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA, )  
14 Plaintiff, )  
15 v. )  
16 RENATO MENDOZA MEDINA, )  
a/k/a Rene Mendoza Medina, )  
17 PHYLLIS REYES CUISON, )  
a/k/a Phyllis Cundangan Reyes, and )  
18 RAWLIN CUNDANGAN REYES, )  
19 Defendants. )

No. CR 06-0144 JSW

**STIPULATION AND  
~~PROPOSED~~ ORDER REGARDING  
EXCLUSION OF TIME**

20 The defendants came before the Court for an initial status appearance on March 23, 2006.  
21 The matter was set over until April 20, 2006 at 2:30 p.m. before the Court for a status hearing.  
22 The parties agreed, and the Court found, that the time between March 23, 2006 and April 20,  
23 2006 is properly excluded under the Speedy Trial Act, Title 18, United States Code, Sections  
24 3161(h)(8)(A) and (h)(B)(ii) and (iv). The parties agreed, and the Court found that, that the case  
25 was complex, due to the nature of the crime, the number of different entities, bank accounts, and  
26 identities involved, and the large amount of discovery which the defense needs to review. Due to  
27 the complexity of this matter, failure to grant the requested continuance would unreasonably  
28 deny the defense the reasonable time necessary for effective preparation. The parties agree that  
the continuance from March 23, 2006 until April 20, 2006 is also necessary due to continuity of

1 defense counsel, given the need for defense counsel to spend time preparing other cases during  
 2 this time period. The parties agree that the ends of justice served by granting the requested  
 3 continuance outweigh the best interest of the public and the defendants in a speedy trial.

4  
 5 DATED: March 28, 2006

/s/ Christina Hua  
 CHRISTINA HUA  
 Assistant United States Attorney

6  
 7 DATED: March 28, 2006

/s/ Cristina Arguedas  
 CRISTINA C. ARGUEDAS  
 Counsel for Renato Mendoza Medina

8  
 9  
 10 DATED: March 28, 2006

/s/ Lidia Stiglich  
 LIDIA STIGLICH  
 Counsel for Rawlin Cundangan Reyes

11  
 12 DATED: March 28, 2006

/s/ Ann Moorman  
 ANN MOORMAN  
 Counsel for Phyllis Reyes Cuison

13  
 14  
 15 ORDER

16 For the foregoing reasons, and as stated on the record at the March 23, 2006 hearing in this  
 17 matter, the Court HEREBY ORDERS the period between March 23, 2006 and April 20, 2006  
 18 excluded from the speedy trial calculation under Title 18, United States Code, Sections  
 19 3161(h)(8)(A) and (h)(B)(ii) and (iv). The Court finds that the failure to grant the requested  
 20 continuance would unreasonably deny defense counsel the reasonable time necessary for  
 21 effective preparation, given the complexity of this case and the need for continuity of counsel.  
 22 The Court finds that the ends of justice served by granting the requested continuance outweigh  
 23 the best interest of the public and the defendant in a speedy trial and in the prompt disposition of  
 24 criminal cases.

25 IT IS SO ORDERED.

26 DATED: March 30, 2006

27  
 28  
  
 JEFFREY S. WHITE  
 United States District Judge